

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

HUBERT JONES,)	
PLAINTIFF,)	
V.)	CIVIL ACTION NO: 1:05CV-612-MHT
DAVID JONES, et. al.,)	
DEFENDANTS.)	

PLAINTIFF'S RESPONSE TO TRANS UNION LLC'S ANSWER

Comes now the Plaintiff, Hubert Jones, by and through counsel of record, Donna C. Crooks, and files this his Response to the Defendant Trans Union LLC's Answer and Defenses to the Amended Complaint filed heretofore and would show say as follows:

1. Plaintiff adamantly denies that he failed to mitigate damages as alleged in the defenses filed by Defendant Trans Union LLC.
2. Plaintiff adamantly denies that he was contributorily negligent as alleged in the defenses filed by Defendant Trans Union LLC.

Respectfully submitted on this the 29th day of September, 2006.

s/Donna C. Crooks
DONNA C. CROOKS (CRO-056)
ATTORNEY FOR PLAINTIFF
HUBERT JONES
P.O. BOX 65,
DALEVILLE, AL. 36322
(334) 598-9534
donnaccrooks_lawfirm@yahoo.com

CERTIFICATE OF SERVICE

This is to certify that on the 29th day of September, 2006, a true and correct copy of the above and foregoing document has been electronically filed with the foregoing Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel and/or a copy is mailed via U.S. Mail, postage prepaid and properly addressed to those individuals who are non-CM/ECF participants:

EXPERIAN

Anna Kelly Brennan
Balch & Bingham
P.O. Box 306
Birmingham, AL 35201-0306
kbrennan@balch.com, slee@balch.com
205-226-3475
205-488-5328 Fax

Griffin Lane Knight
Balch & Bingham
P.O. Box 78
Montgomery, AL 36101-0078
lknight@balch.com, dearly@balch.com
334-269-3124

Brian Stephen Spitler
Jones Day
1420 Peachtree St. NE
Suite 800
Atlanta, GA 30309-3053
bsspitler@jonesday.com tlmaro@jonesday.com

EQUIFAX

Edward Luckett Robinson, II
Hand Arendall, LLC
P.O. Box 123
Mobile, AL 36601
lrobinson@handarendall.com abradley@handarendall.com
251-432-5511
251-694-6375 Fax

G. John Cento
Kilpatrick & Stockton, LLP
1100 Peachtree Street
Suite 2800
Atlanta, GA 30309-4530
Jcento@KilpatrickStockton.com
404-815-6447
404-541-4632

TRANSUNION

Kary B. Wolfe
Walston Wells Anderson & Birchall, LL
P.O. Box 830642
Birmingham, AL 35283-0642
kwolfe@walstonwells.com
205-244-5281
205-244-5481 Fax

Marc F. Kirkland
Strasburger and Price LLP
2801 Network Boulevard
Suite 600
Frisco, TX 75034
Marc.Kirkland@strasburger.com
469-287-3946
469-227-6575 fax

DAIMLER CHRYSLER

Anthony Smith
Sirote & Permutt
P.O. Box 55727
Birmingham, AL 35255-5727
tsmith@sirote.com
205-930-5100
205-930-5101 Fax

Lee Reeves
Sirote & Permutt
P.O. Box 55727
Birmingham, AL 35255-5727
lreeves@sirote.com
205-930-5100
205-930-5101 Fax

MIKE SHAD

Patrick R. Norris
McDaniel, Bains & Norris, P.C.
Two Metroplex Dr. Suite 504
Birmingham, AL 35209-6812
pnorris@mbn-law.com norrisjd@bellsouth.net

David Jones, Pro Se
6870 103 St. Apt. 210
Jacksonville, FL 32210

Cornelius Jenkins
c/o Nimmicht Chevrolet
1550 Cassat Avenue
Jacksonville, FL 32210

/s/ Donna C. Crooks
OF COUNSEL